

**EXAMINATION OF THE STROUD DISTRICT LOCAL
PLAN REVIEW**

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

**MATTER 6e:
Gloucester's Rural Fringe Site Allocations**

On Behalf of: Redrow Homes

February 2023



Introduction

CarneySweeney has been instructed by Redrow Homes to submit a Hearing Statement in respect of Matter 6e pursuant to the Issues, Matters and Questions identified by the Local Plan Examination Inspectors in respect of Stroud District Council's Local Plan Review.

This Hearing Statement should be read alongside the representations we have previously made to the Local Plan and in particular, the representations made to the Regulation 19 Consultation (July 2021) and Technical Evidence Consultation (October 2022).



Matter 6e Gloucester's rural fringe site allocations

Local Sites Allocation Policy HAR017 Land at Sellars Road, Hardwicke

No comment

1. **The site is allocated for up to 10 dwellings and open space uses.**
 - a. **Does the policy clearly set out what type and level of open space uses would be required or is this covered by other policies? Is this requirement justified?**
 - b. **The policy requires particular issues to be addressed, including integration with surrounding land uses, undertaking a precautionary archaeological evaluation and surface water management. Are these requirements clear and are they justified? Or are such issues covered by other Plan policies?**
 - c. **Reference is made in the supporting text to conserving the setting of the adjacent canal and to retain trees and hedgerows. In relation to the canal towpath it adds that there are opportunities to improve pedestrian and cycle linkages. Are these justified and if so, should they be made explicit within the policy as requirements, or are they covered by other Plan policies?**

Strategic Site Allocation Policy PS30 Hunts Grove Extension

No comment

2. **The site is allocated as an extension to the existing Hunts Grove development. It is proposed to 'deliver an additional 750 dwellings, including 225 affordable dwellings (unless viability testing indicates otherwise)'. The policy seeks a comprehensive masterplan which demonstrates how the extension will be integrated into the Hunts Grove new community and lists 13 requirements.**
 - a. **Are all the 13 listed requirements justified by robust evidence, are they sufficiently clear in their detail and do they all relate to the site allocation? Do any requirements duplicate other Plan policies and if so, why?**
 - b. **The map for the site on page 146 of the Plan provides 'indicative information'. The local centre, primary school and safeguarded area for potential future rail halt, are all shown as being outside the site allocation, and are instead within the wider Hunts Grove development. However, these are listed as requirements to be addressed in the masterplan for the Hunts Grove extension. Can the Council provide clarification on this?**



- c. *The provision of 225 affordable houses is subject to viability testing. Is this approach justified, does it correspond with Core Policy CP9 on affordable housing, and is it consistent with national policy? Has the affordable housing provision for this site been viability tested?*
- d. *Some of the representations include suggested modifications to the policy wording, particularly in relation to criteria 10 and 12. Another includes a suggested new criterion on appropriate mitigation measures or replacement green infrastructure to safeguard the AONB from development pressure. Are any of these suggested modifications necessary for soundness?*
- e. *Some representors raise other concerns relating to the development of the site, including the impact of additional traffic, the loss of green space and the effect on local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?*

Employment Allocation Policy PS32 Quedgeley East Extension

No comment

- 3. *The site is 5 hectares in size and is allocated as an extension to the Quedgeley East Business Park, for office, B2 and B8 employment uses. The policy also requires a strategic landscape buffer along the south-eastern edge of the development.*
 - a. *Is an extension to the existing employment site in this location, and with the specified uses, justified by robust evidence?*
 - b. *As regards the strategic landscape buffer, is the Plan sufficiently clear about what would be expected to be delivered within the site or is this covered by other Plan policies?*
 - c. *The policy requires sustainable transport measures and necessary highway improvements. What specifically would the development need to provide, are they justified and would they be viable?*
 - d. *Some of the representations raise concerns about other issues relating to the development of the site, including the protection of ancient trees and the impact on the environment and local character. Have such factors been suitably assessed as part of the process to allocate this site?*

Employment Allocation Policy PS43 Javelin Park



No comment

- 4. The site is 27 hectares in size and is allocated as an extension to the key employment site EK14 Javelin Park for office, B2 and B8 employment uses. The policy also requires a strategic landscape buffer along the western, southern and eastern boundaries of the development.**
- a. Is an extension to the existing employment site in this location, and with the specified uses, justified by robust evidence?**
 - b. As regards the strategic landscape buffer, is the Plan sufficiently clear about what would be expected to be delivered within the site or is this covered by other Plan policies?**
 - c. The policy requires sustainable transport measures and necessary highway improvements. What specifically would the development need to provide, are the requirements justified and would they be viable and deliverable?**
 - d. The supporting text refers to development minimising ‘potential visual impacts upon the heritage assets and their immediate settings at adjacent Haresfield’ and the AONB, but these are not set out in the policy.**
 - i. What is the significance of these heritage assets and has any assessment been carried out to determine what the potential impacts of development would be in this regard?**
 - ii. Why is a requirement to conserve the significance of these heritage assets and their settings not identified within the policy? Is this suitably set out in other Plan policies? Is the wording in the supporting text consistent with national policy on the historic environment?**
 - iii. Has the impact of development within this site, in relation to the AONB, been robustly considered and is this clearly set out in the Plan?**
 - e. Some of the representations raise concerns about other issues relating to the development of the site, including the effect of additional traffic and the impact on the environment and local character. Have such factors been suitably assessed as part of the process to allocate this site?**



Strategic Site Allocation Policy G1 South of Hardwicke

5. The site is identified as an urban extension to Hardwicke and is allocated as a strategic housing development, including residential and community uses. The policy seeks a development brief incorporating an indicative masterplan which ‘will address’ 20 policy criteria. The site is proposed to include approximately 1,350 dwellings.

a. Are the 20 criteria justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective? Do some criteria unnecessarily repeat other Plan policies?

A Statement of Common Ground (SoCG) has been prepared between Stroud District Council and Redrow Homes which sets out the main areas of agreement in relation to Strategic Site G1: Land South of Hardwicke and identifies the areas where further discussions are required. It can however be seen from the SoCG that there are many more areas of agreement than areas which need to be further clarified.

The main areas of where further clarification is required relate to points of detail rather than principle but Redrow Homes’ key outstanding concerns relate to the following points:

- Development Brief – we raise concerns to the unnecessary requirement in Policy G1 for a development brief and indicative masterplan to be approved by the Council. This could lead to unnecessary delays and duplication of work which consequently will undermine site delivery and the housing trajectory. The requirement of a development brief is further questioned due to the imminent submission of a planning application for the whole site which encompasses the entire G1 Strategic Site Allocation area. A masterplan only approach is therefore deemed more appropriate in relation to Strategic Site Allocation G1.
- Bullet Point 12 (Walking and Cycling Routes) – whilst we agree with the principle of providing additional connections, and connections can be provided to the legal site boundary which adjoins Quedgeley West Business Park, to provide a connection beyond this point may require contributions from Stroud District Council/Gloucestershire County Council to deliver the necessary links onto 3rd party land as no future potential connection points were safeguarded within the development of the Business Park.
- Bullet Point 19 – the wording of bullet point 19 regarding any associated infrastructure enhancements required is considered too vague and should either be further defined or deleted altogether. It is recognised that Infrastructure and Developer Contributions are covered by Policy CP6 of the Local Plan and shouldn’t need to be repeated in Policy G1.



Please also refer to the additional comments we have made in respect of the wording of this policy.

We would agree that only site-specific policies which aren't otherwise covered by other Local Plan Review policies are included within Strategic Site Allocation Policies to reduce repetition and ensure a consistent approach is taken on the application of topic based objectives across all development proposals.

Details regarding our suggested changes to Strategic Site Allocation G1 policy criterion are set out within our Regulation 19 Consultation Response to the Pre-Submission Draft Local Plan and not re-created here.

b. Whilst the policy includes the development of a local centre and educational and healthcare provision or contributions, there appears to be no provision for other employment uses. Is this because such facilities are within close proximity and if so, what are the walking distances to such facilities from within the site?

Yes, employment opportunities are within close proximity to Strategic Site Allocation G1. Quedgeley West Business Park is an immediate neighbour to the south of the application site approximately 900m walk or cycle from the centre of the site via the A38 (approximately 11 minutes on foot or 3 minutes by bicycle); routes could be constructed up to the boundary with the Quedgeley West site and, with the agreement of the owner, direct walking and cycling connections could be made into this neighbouring employment site which would reduce journey distances/times. Waterwells Business Park is also located nearby approximately 700m - 2.1km walk or cycle to the east of the application site (approximately 8 - 25 minutes on foot or 2 - 6 minutes by bicycle) and Olympus Park is approximately 2.4km walk or cycle to the north of the application site (approximately 29 minutes on foot or 7 minutes on bicycle). Javelin Park and Quedgeley East Business Park are both located approximately 2.5km walk or cycle to the south of the application site (approximately 30 minutes on foot or 8 minutes on bicycle). In addition, further employment opportunities would be available in Gloucester, Cheltenham and Stroud accessible on frequent and direct local bus services.

The Gloucester Fringe area therefore has an important role within Stroud District and is one of the District's employment hubs and the settlement functions as significant 'dormitory' for a large working population. The site allocation itself makes provision for the provision of a Local Centre but it is not considered that any other employment uses are required at this location given the above.



c. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

In terms of highways, as set out in our previous representations (in particular to EB98 (Traffic Forecasting Report Addendum)), the updated traffic modelling reflecting the revised allocations has not accounted for the additional interventions set out in the STS Addendum; the further reductions in traffic from the additional Sustainable Transport Strategy (STS) intervention measures now proposed are not realised in the model results. If these were included the level of highway mitigation may be reduced. More detail of the more major mitigation schemes, notably at M5 J12 is required as the delivery of this will be key in delivering Local Plan growth. The updated modelling has shown that the additional development at Javelin Park will put further pressure on the operation of the highway network at M5 J12 for which further mitigation is likely. The required highways mitigation works at M5 J12 and the M5 as a whole represent a strategic network issue and cannot be solely the responsibility of Stroud District Council or its Local Plan's Strategic allocations to 'fix'.

There is uncertainty over the overall cost of improvement works, errors in the apportionment of impacts and an expectation that significant proportions of the funding of the mitigation packages will come from neighbouring authorities (our comments on EB109 (Traffic Funding and Delivery Plan)). There are inconsistencies with regard to the transport infrastructure and focus for funding identified in respect of G1 South of Hardwicke and other sites when comparing the various technical evidence documents (our previous comments on EB110 (Infrastructure Delivery Plan Addendum)).

In terms of education, Policy G1, as currently drafted within the Submission Draft Local Plan, outlines no requirement for a secondary school to be provided on site, but rather financial contribution towards secondary school provision being required. It is understood that a new secondary school in the locality will be accommodated at Whaddon. As such, no provision for a secondary school has been included within the masterplan for Land to the South of Hardwicke. The reference of a secondary school being accommodated on Strategic Allocation G1 should therefore be removed and replaced with a financial contribution towards secondary school provision instead.

In terms of delivery, the IDP does not provide any detail as to how the infrastructure on Strategic Sites will be funded. Section 10 of the Viability Assessment Refresh however identifies that the infrastructure required on strategic sites will be funded in part by CIL, although no detail is provided on how this will operate in practice, and this will again be material to the viability of the Local Plan Review. The mechanisms to deliver the strategic infrastructure (whether this be through CIL, S106, neighbouring LPA's or other funding sources) should be clarified and explicitly set out in the Local



Plan and IDP so as not to cause any unnecessary delays to the delivery trajectory or phasing of the strategic sites (our previous comments on EB98).

Additionally, paragraph 2.9.30 of the Pre-Submission Plan suggests that the IDP will be reviewed and updated as circumstances change. This infers that the levels of infrastructure identified by the IDP and presumably sought by the emerging Local Plan could change without these being subject to examination, relevant policies reviewed accordingly. Such changes could lead to the deliverability of the emerging Local Plan being undermined contrary to paragraph 34 of the NPPF.

d. Some of the representations raise concerns about other issues relating to the development of the site, including environmental impact . Have such factors been suitably assessed as part of the process to allocate this site?

For the Council to respond but it is recognised that Redrow Homes, as part of the Candidate Site process and subsequent Local Plan Review consultations, have provided the Council with a comprehensive suite of technical site specific assessments including: Ecology Reports, Protected Species Surveys and Reports, Flood Risk, Drainage Strategy, Services and Utilities, Landscape and Visual Assessment, Arboriculture Assessment, Heritage Assessment, Archaeological Assessments and Highways and Transportation information to inform this process. Redrow Homes also supplemented the original Candidate Site submission with a Constraints and Opportunities Plan as well as an Illustrative Masterplan to demonstrate how the site could be developed in a sustainable manner and as a positive response to the known site constraints and opportunities. The masterplan has not only evolved in response to the known site constraints and opportunities of the site but also in response to the comments received from relevant statutory and other consultees during public consultation events.

It is therefore considered that in the context of Strategic Site Allocation G1: Land to South of Hardwicke, the Council has always had the benefit of having a comprehensive up to date suite of site-specific technical assessments and evidence on which to base their assessments upon alongside their own sources of information and assessments.

The technical assessments and masterplan exercises which have been undertaken in relation to the Land South of Hardwicke have also been used to inform Redrow Homes Regulation 19 Response to the Council's Sustainability Appraisal of the site in relation to a number of set Sustainability Objectives and Scores given in both 2019 and 2021. On the whole, Redrow Homes' agreed with the Council's assessment/scores of the site, as set out by the Sustainability Appraisal. Where we did not agree with the Council's scoring, further information was provided in order to justify and evidence the newly suggested score which further reinforced Hardwicke's performance in



respect of the Sustainability Objectives and Land South of Hardwicke as being an appropriate location for, and to deliver, strategic development within the Gloucester Fringe and Stroud District.

In addition to the above, the site was the subject of a formal Screening and Scoping exercise under the Town and Country Planning (Environmental Impact Assessment (EIA)) Regulations 2017 in September 2020 (ref: 2020/0544/EIAS) which has been used by Redrow Homes and their consultant team to work up a planning application and associated Environmental Statement (ES) for the development of the site for approximately 1350 residential dwellings together with a primary school, local centre, community uses, highway improvements and associated ancillary uses including open space, green infrastructure and drainage attenuation.

It is Redrow Homes intention to submit a planning application, supported by an Environment Statement for the site in Spring 2023.

Strategic Site Allocation Policy G2 Land at Whaddon

No comment

Further to our previous questions under Matter 3 on meeting Gloucester City's unmet housing need and whether the principle of this site allocation as safeguarded land is soundly based, we have the following additional questions on the specific details within the policy.

- 6. The site is proposed to be 'safeguarded' to meet future housing needs of Gloucester City, if required. The policy seeks a development brief incorporating an indicative masterplan, that will address 22 listed requirements. This includes the provision of at least 3,000 dwellings, 8 serviced plots for travelling showpeople and necessary infrastructure.***
 - a. If this is proposed as a safeguarded site and a decision on whether it would be allocated for development would be made through a future review of the Plan, why is it necessary at this stage to set out specific requirements for the site?***
 - b. Are all the 22 listed requirements justified by up to date robust evidence and are they sufficiently clear and effective in their level of detail? Do any duplicate other Plan policies and if so, why?***
 - c. Have all site constraints and development impacts been robustly assessed, particularly as regards highways and opportunities for sustainable modes of transport?***



- d. Are necessary infrastructure requirements and mitigation measures proposed within the policy and would these ensure the development was sustainable, particularly in terms of travel modes?***
- e. Has the boundary been correctly drawn on the maps within the Plan (pages 155 and 160) and on the policies map?***
- f. Some representors raise other concerns relating to the development of the site, including the impact on wildlife, flooding and the character of the area and the recreational pressures on the AONB. Have such factors been suitably assessed as part of the process to allocate/safeguard this site?***
- g. The site does not form part of the housing trajectory. If the site was found to be required to meet unmet housing needs, what would be its delivery timeframe and would this be realistic?***

